

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

TITLE V DRAFT NO. VF-02-003 (REVISION 1)

AMERICAN FUJI SEAL, INC.

1051 BLOOMSFIELD ROAD, BARDSTOWN, KY.

MAY 28, 2003

DOROTHY NGUYEN, REVIEWER

PLANT I.D. # 21-179-00031

APPLICATION LOG # 54972

SOURCE DESCRIPTION:

American Fuji Seal is a manufacturer of labels for the food, beverage and household products industry. American Fuji Seal is a Title V source but the source has not been issued a final Title V permit. Therefore, construction at this source must be permitted separately. The new rotogravure printing units and a parts washer are covered by VF-02-003 Title V permit. EP044, rotogravure printing units consists of a printing press, drying oven, clean up solvent, and a recuperative catalytic oxidizer. The printing press will have 10 applicators, which are exhausted/vented to the oxidizer. Solvent based inks are used to print on a shrink film at the press; all vapor and exhaust from the press and cleaning solvent are processed through the oxidizer. EP045, Parts washer is a closed loop hard piped system and includes a dryer and recovery system. There is no control equipment at this emission point.

Initial Permit- The initial VF permit was issued on September 13, 2002. It authorized the facility to construct/operate a rotogravure press and a parts washer. These two facilities have a combined VOC limitation of less than or equal to 36 tons per year (tpy). There are also HAPs limits of less than 9 and 22.5 tpy individual and combined respectively for the entire source.

Revision 1 - On September 6, 2002 the source applied to construct Ko-Pack Press #1, which includes an 11 station flexographic printing press (EP 46). Additional information was received on March 28, 2003. The Division determined that the Ko-Pack Press and the rotogravure press and parts washer for which VF-02-003 was originally issued are one project. Therefore, emissions from the Ko-Pack Press are limited under the same 36 tpy limit for VOCs, and fall under the sourcewide HAPs limits.

TOTAL POLLUTANTS OF CONCERN						
	VF-02-003		New Construction		VF -02-003 (Rev. 1)	
	Potential (tpy)	Actual (tpy)	Potential (tpy)	Actual (tpy)	Potential (tpy)	Actual (tpy)
PM/PM10	0.29	0.29	+0.01	0.01	0.30	0.30
SO ₂	0.02	0.02	+0.00	0.00	0.02	0.02
NO _x	3.83	3.83	+0.12	0.12	3.95	3.95
CO	3.22	3.22	+0.10	0.10	3.32	3.32
VOC/THC	Limited to 36.0	14.18	+26.29	26.90	Limited to 36.0	Limited to 36.0
SINGLE HAP	Limited to 9.0	2.75	Limited to 9.0	0.24	Limited to 9.0	3.0
COMBINED HAP	Limited to 22.5	2.75	Limited to 22.5	0.24	Limited to 9.0	3.0

					22.5	
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COMMENTS:

Type of control and efficiency

A recuperative catalytic oxidizer (RCO) will be used to control pollutants emission from rotogravure printing units, EP044(043). The RCO control efficiency is assumed to be 98%. Control efficiency will be determined through stack testing.

The VOC emission capture efficiency is assumed to be 100% based on the assumptions that the rotogravure printing unit is completely contained within a building enclosure. The source is required to demonstrate VOC emission capture efficiency using EPA testing method 204.

There is no control equipment for EP045(044).

All VOCs consumed during printing are assumed to be emitted.

All VOCs consumed during cleaning are assumed to be emitted.

Applicability Regulation:

EP044(043) is subjected to Regulation **401 KAR 59:212**, New graphic arts facilities using rotogravure and flexography, which applies to each affected facility that is part of a major source in a county designated attainment on which construction commenced on or after June 24, 1992.

401 KAR 59:185, New solvent metal cleaning equipment, does not apply to the parts washer used as part of press. The parts washer used at American Fuji Seal does not fit the description of a cold cleaner or any other solvent metal cleaning equipment.

The source has the potential to be a major source for Hazardous Air Pollutants. The source has voluntary requests limit of less than 9.0 tpy for any individual HAP and less than 22.5 tpy for combined HAPs to preclude the applicability of 40 CFR 60 Subpart KK, National Emission Standards for Hazardous Air Pollutants for the Printing and Publishing Industry. These new emission points, EP044 and EP045 have zero HAP emissions.

EMISSION AND OPERATING CAPS DESCRIPTION:

American Fuji Seal voluntarily requested limits of less than 9.0 tpy for any individual HAP emission and less than 22.5 tpy for combined HAPs emission to preclude the applicability of 40 CFR 60 Subpart KK, National Emission Standards for Hazardous Air Pollutants for the Printing and Publishing Industry. VOC emissions for EP 44-46 are limited to less than or equal to 36 tpy.

PERIODIC MONITORING:

The VOC capture efficiency of the capture system at the source will be initially determined through testing. Continuous monitoring and record keeping are used to demonstrate capture efficiency in the source's unit enclosures. Interlocks and periodic interlock checks are used for capture systems.

Pressure differential across the building shall be monitored continuously when the printing press is operating. The inlet temperature of the catalyst bed during printing operation shall be monitored continuously.

OPERATIONAL FLEXIBILITY: N/A

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.